



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
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February 23, 2009

Bobby Blackmon, Division Administrator
Federal Highway Administration
Tennessee Division
640 Grassmere Park, Suite 112
Nashville, Tennessee 37211

SUBJECT: Final Environmental Impact Statement for State Route 397 (Mack Hatcher Parkway Extension) from U.S. 31 south of Franklin to U.S. 431 north of Franklin in Williamson County, Tennessee; CEQ Number 20090015

Dear Mr. Blackmon:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. The Tennessee Department of Transportation (TDOT) and the Federal Highway Administration (FHWA) propose to complete State Route 397, Mack Hatcher Parkway, around the west side of the City of Franklin from U.S. 31 to U.S. 431 in Williamson County, Tennessee.

The proposed action includes construction of a four-lane divided, limited access facility on primarily new alignment within right-of-way that ranges from a minimum of approximately 133 feet in the urban sections and a maximum of approximately 250 feet in the rural sections. The total length of the proposed project is approximately 7.5 miles. The project will also include an adjacent multi-use path, exclusively designated for walking, biking, skating and other forms of non-motorized travel. When combined with the existing Mack Hatcher Parkway, this project would create a complete loop around the City of Franklin and provide improved connectivity throughout the region. A total of eight alternatives were considered, including seven build alternative alignments and the no action alternative. Alternative G was identified as the preferred alternative.

EPA's primary concerns raised in the review of the Draft EIS and Supplemental Draft EIS were related to the potential for significant direct and indirect impacts to water quality as well as impacts to the Harpeth River Historic District and other sensitive resources as a result of the proposed action. EPA also asked for additional information related to air quality and environmental justice impacts and included a recommendation to complete the context sensitive design (CSD) process as part of the Final EIS to address pedestrian/bicycle and other typical section design issues. EPA appreciates the additional information included in the Final EIS to address our technical concerns. In particular, it is encouraging to see the inclusion of the multi-use path as part of the project, as recommended by the CSD public process. Furthermore, EPA

appreciates inclusion of the Memorandum of Agreement with the Tennessee State Historic Preservation Office that identifies a number of important mitigation measures. These include: 1) elimination of elevated interchanges and inclusion of at-grade intersections and roundabouts; and 2) a commitment to maintain access control along the project length throughout the Harpeth River Historic District.

EPA is also supportive of the design decision to build the two Harpeth River bridge crossings as parallel bridge structures. These structures will include a continuous span of the Harpeth River from the eastern edge of the floodplain to the western edge of the floodplain, spanning both river crossings and the floodplain in between. This is an important mitigation measure and is also consistent with the CSD recommendations from the public. As a reiteration of our Draft EIS comments, EPA also recommends an additional design measure to further assist in the long-term reduction of pollutant loadings to impaired surface water resources in the project area. Storm water runoff from the proposed roadway, particularly from the two bridge crossings, should be collected and treated before being discharged to surface waters.

Based on the additional mitigation measures described in the Final EIS, EPA has no additional concerns related to this project. We appreciate the opportunity to review the proposed action. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz Mueller", with a stylized, flowing script.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

cc: Tennessee Department of Transportation